contracts for public improvements. *National Surety Co.* v. *Kansas City Brick Co.*, 73 Kan. 196. All contracts in which the public are interested which tend to prevent the competition required by statute are void. *Fishburn* v. *City of Chicago*, 171 Ill. 338. There is a split of authority on the question whether bidding on a patented article allows the necessary competition. In *Terwilliger Land Co.* v. *Portland*, 62 Ore. 101, an ordinance inviting bids for the improvement of streets with Hassam Pavement, a patented process, was held to be void. In *State* v. *Shawnee County*, 57 Kan. 267, the court held that it was hardly intended by the law that the public should be barred from using recent inventions or obtaining beneficial improvements because they were covered by an authorized patent or were the product of exclusive manufacture. See other cases and notes in 5 MICH. L. REV. 484, 485, 708. With a view for insuring the city both competition and the benefit of different processes, Judge Cooley held that the kind of material is not required to be determined in advance of advertisement for bids, saying that when bids are thus called for all bidders for a particular kind of pavement are bidders against all others in a certain sense, but they are also bidders against each other in a more particular sense. *Atty. Gen. ex rel. Cook* v. *Detroit*, 26 Mich. 263. The courts usually hold that bidding on the basis of different kinds of materials is permissible. *Baltimore* v. *Flack*, 104 Md. 107; *Schuck* v. *Reading*, 186 Pa. 248. Specifications must be prepared in advance sufficiently definite to enable bidders to prepare their bids intelligently. 20 AM. & ENG. ENC. OF LAW 1167. Where the quantity of the work is not described in the specifications, the contracts made thereunder are void. *Wells* v. *Burnham*, 20 Wis. 119; *Cal. Improv. Co.* v. *Reynolds*, 123 Cal. 88. See 38 L. R. A. (N. S.) 663.

MUNICIPAL CORPORATIONS—SPECIAL ASSESSMENTS ON IMPROVEMENTS.—Where the landowners on an island were assessed for the expense of a roadway established on the mainland, where their property was isolated from and inaccessible to the street and could only be reached by a bridge estimated to cost a very large sum of the money and the building of which was not contemplated in the near future, *held*, that the assessment was invalid because the benefits were too remote. *City of Seattle* v. *Peabody* (Wash., 1920), 192 Pac. 961.

The expense of making improvements is very generally met in whole or in part by local assessments authorized to be made upon persons or property benefited or deemed to be benefited. 2 DILLON ON MUNICIPAL CORPORATIONS [3d ed.] 911. A legislative act describing the community benefited will not be disturbed by the courts unless it is obviously erroneous and arbitrary. *Mullins* v. *Little Rock*, 131 Ark. 198. The benefits which will legalize an assessment for the expense of a local improvement must be a present benefit immediately accruing, and speculative benefits which may never be realized are not sufficient. *In re West Wheeler St.*, 97 Wash. 669. The question as to what constitutes a speculative benefit has caused the courts a great deal of difficulty. In *Hutt* v. *Chicago*, 132 Ill. 352, the street ran to the point

where a bridge would be built, if one was ever constructed, and the property owners across the river were not liable on the special assessment. Where, however, the street was built to a place where the city contemplated building a bridge in the near future and the street was built with the intention that such a bridge would be constructed, the property owners across the river were liable on the special assessment. *Dickson* v. *City of Racine,* 65 Wis. 306. In the latter case the court said that it would be absurd to say that the contemplated building of the bridge should have no effect in estimating benefits. In *Chamberlain* v. *Cleveland,* 34 Ohio St. 551, the court held that the opening of one street rendering practicable that of another contemplated street which could not have been opened before might be considered in estimating the special benefits. The probability that the city might in the future project a sewer to form a connection with the first sewer is too remote a benefit to be assessed. *State, N. J. R. R.* v. *City of Elizabeth,* 37 N. J. L. 330. Land which can be drained into a trunk sewer only after laterals are built cannot be assessed for the costs of the trunk until such laterals are constructed. *State, Kellogg Bros.* v. *City of Elizabeth,* 40 N. J. L. 274. See 28 CYC. 1129.

NEGLIGENCE—HOUSE GUEST A MERE LICENSEE—LIABILITY OF HOST FOR INJURIES DUE TO SLIPPERY FLOORS.—Defendant invited plaintiff and her husband to be guests at the house of the former on New Year's Eve and New Year's Day. They accepted, and while in the home of the defendant the plaintiff was injured by the slipping of a small oriental rug on the polished hardwood floor. In action for damages, *held,* defendant not liable. *Greenfield* v. *Miller* (Wis., 1921), 180 N. W. 834.

Although there by invitation, plaintiff was not in law an invitee but a mere licensee. The duty of an occupier to an invitee is of course not the same as to a licensee, though in the principal case on the facts the result probably would have been the same. In the case of a licensee the occupier owes a duty merely to give warning of any concealed danger of which he actually knows. SALMOND ON TORTS [5th Ed.], § 122. For positive negligence there would of course be liability, as, for example, if the host were to drop carelessly a lamp upon the foot of the guest. While the licensee, the social guest is on the premises solely by reason of the host's invitation, curiously in the view of the law it may be fairly said that the latter has "no interest" in the matter. "A licensee," says Salmond, "may be defined as a person who enters the premises by the permission of the occupier, granted gratuitously in a matter in which the occupier has himself no interest." If the host, however, takes the guest out for a joy ride in an automobile and, due to careless driving, he is injured, there may be a recovery. *Avery* v. *Thompson* (Me.), 103 Atl. 4; *Perkins* v. *Galloway,* 194 Ala. 265, L. R. A. 1916 E, 1190; *Massaletti* v. *Fitzroy,* 228 Mass. 487 (if negligence is gross). But if the guest fails to advise and, if necessary, remonstrate from time to time regarding speed, etc., even though he rides on the back seat, he may be refused recovery on the ground of contributory negligence. *Howe* v. *Corey* (Wis., 1920), 179 N. W. 791, 19 MICH. L. REV. 433. The decision in